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January 12, 2022

REQUEST GRANTED.

BY ECF

Hon. Lewis J. Liman
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

1/13/2022 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

RE: United States v. Ortiz-Molina, et al, 21 Cr. 173 (LJL)

Dear Judge Liman:

We write on behalf of our client, Jerremy Ortiz-Molina, to respectfully seek leave to file under seal Exhibits A and B to our letter requesting his continued release on conditions following his plea hearing (the "Letter"), pursuant to Section 8(H) of Your Honor's Individual Practices in Criminal Cases.

Exhibits A and B are medical records containing confidential medical information relating to the health of a family member of Mr. Ortiz-Molina. *Matter of New York Times Co.*, 828 F.2d 110, 116 (2d Cir. 1987) (noting that "the First Amendment right of access to criminal proceedings is not absolute . . . documents may be sealed if specific, on the record findings are made demonstrating that closure is essential to preserve higher values and is narrowly tailored to serve that interest.") (Internal quotation marks omitted). The Government does not object to this request.

Pursuant to Section 8(G) of Your Honor's Individual Practices in Criminal Cases, we note that the Letter refers to the personal health information

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contained in Exhibits A and B, as well as other private medical information. Because this information constitutes “medical records, treatments, and diagnosis” pursuant to the Southern District of New York’s Privacy Policy, we have redacted this information from the Letter. The Government does not object to our redaction of this information in the Letter.

Respectfully submitted,

/s/ Jocelyn E. Strauber

Jocelyn E. Strauber

cc: AUSA Jun Xiang (via ECF)